1	RENE L. VALLADARES Federal Public Defender		
2	State Bar No. 11479 BRIAN PUGH Assistant Federal Public Defender		
3	Assistant Federal Public Defender Law Office of the Federal Public Defender 411 E. Bonneville Avenue, Suite 250		
4	Las Vegas, Nevada 89101 (702) 388-6577/Phone		
5	(702) 388-6261/Fax Brian_Pugh@fd.org		
6	Attorney for Karen Chapon		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
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10	UNITED STATES OF AMERICA,	) Case No: 2:20-cr-286-JCM-NJK	
11	Plaintiff,	) STIPULATION TO MODIFY	
12	VS.	) CONDITIONS OF RELEASE	
	KAREN CHAPON,		
13 14	Defendant.	) ) )	
15	IT IS HEREBY STIPULATED AND	O AGREED, by and between Christopher Chiou	
16	Acting United States Attorney, and Jessica Oliva, Assistant United States Attorney, and Rene L		
17	Valladares, Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender, counse		
18	for Karen Chapon, that Ms. Chapon's pretrial release travel condition be amended to allow Ms		
19	Chapon to stay in Colorado as outlined below.		
20	This stipulation is entered into for the following reasons:		
21	1. On July 9, 2021, the Court modified Ms. Chapon's conditions of pretrial release		
22	to permit her to travel to Colorado from July 9 to July 26, 2021 to visit her father, who had been		
23	admitted to hospice care. ECF No. 56.		
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1 2. Ms. Chapon's father died, and she requests to stay for the funeral and help her 2 mother settle her father's final affairs. 3 3. Ms. Chapon requests that she be permitted to stay in Colorado until August 19, 2021. 4 5 4. Ms. Chapon has been on pretrial supervision for eight months. During that time, she has had a minor violation which was addressed by Ms. Chapon agreeing to forfeit her medical 6 7 marijuana card. 8 5. Ms. Chapon's Pretrial Services Officer does not oppose this modification if 9 Pretrial Services is able to arrange for drug testing in the District of Colorado. Ms. Chapon's 10 Pretrial Services Officer is in the process of determining whether doing so will be possible. Ms. 11 Chapon agrees to submit to drug testing in the District of Colorado during her time there from the date of this stipulation through her return to the District of Nevada. 12 /// 13 14 /// /// 15 16 /// 17 /// 18 /// 19 /// /// 20 21 /// 22 2

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1	6. The parties agree to this modification.	
2	Dated this 23 <sup>rd</sup> day of July 2021.	
3	RENE L. VALLADARES Federal Public Defender	Christopher Chiou Acting United States Attorney
4	By /s/ Brian Pugh	By /s/ Jessica Oliva
5	BRIAN PUGH Assistant Federal Public Defender	JESSICA OLIVA
6	Counsel for Defendant	Assistant U.S. Attorney
7	ORDER	
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9	IT IS SO ORDERED.	
10	Bar Lawekala	
11	BRENDA WEKSLER	
12	United States Magistrate Judge	
13	DATED:	
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